Laurence M. Rosen, Esq. (SBN 219683) THE ROSEN LAW FIRM, P.A. 355 South Grand Avenue, Suite 2450 Los Angeles, CA 90071 Telephone: (213) 785-2610 Facsimile: (213) 226-4684 5 Email: lrosen@rosenlegal.com 6 Lead Counsel for Plaintiffs 8 [Additional counsel on signature page] 9 UNITED STATES DISTRICT COURT 10 CENTRAL DISTRICT OF CALIFORNIA 11 In re Silver Wheaton Corp. Securities Case No: 2:15-cv-05146-CAS-PJW 12 Litigation 13 STIPULATION SETTING SCHEDULE FOR (1) BRIEFING ON 14 **MOTION TO DISMISS AND (2)** 15 ACCEPTING SERVICE OF SUMMONS AND COMPLAINT 16 17 WHEREAS, on March 26, 2018, the Court granted Plaintiffs' motion for leave 18 to amend the complaint to add Deloitte LLP (Canada) ("Deloitte Canada") as a 19 defendant (Docket #248); and 20 WHEREAS, the parties seek to set a schedule for the briefing of any motions to 21 dismiss and a hearing date on any such motions; 22 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by Lead 23 Plaintiff, Defendants Wheaton Precious Metals Corp., f/k/a Silver Wheaton Corp., 24 Randy Smallwood, Peter Barnes, and Gary Brown (collectively, the "Silver Wheaton 25 Defendants"), and Defendant Deloitte Canada, through their undersigned counsel, 26 subject to the Court's approval, that: 27 28 - 1 -STIPULATION SETTING SCHEDULE FOR (1) BRIEFING ON MOTION TO

DISMISS AND (2) ACCEPTING SERVICE OF SUMMONS AND COMPLAINT

- 1. On or before June 4, 2018, all Defendants shall file their respective responses to the Second Amended Complaint.
- 2. With respect to Deloitte Canada's anticipated motion to dismiss the Second Amended Complaint: (i) Plaintiffs shall serve and file their opposition papers on or before July 6, 2018; and (ii) Deloitte Canada shall serve and file its reply papers on or before August 6, 2018.
- 3. If the Silver Wheaton Defendants file a motion to dismiss the Second Amended Complaint, then: (i) Plaintiffs shall serve and file their opposition papers regarding the Silver Wheaton Defendants' motion to dismiss on or before July 6, 2018; and (ii) the Silver Wheaton Defendants shall serve and file their reply papers on or before August 6, 2018.
- 4. The hearing on the anticipated motion(s) to dismiss shall be set for August 20, 2018.
- 5. Deloitte Canada accepts service of process of the Second Amended Complaint (Docket #256).

Dated: April 24, 2018

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence Rosen Laurence M. Rosen, Esq. (SBN 219683) 355 S. Grand Avenue, Suite 2450

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BENJAMIN S. MISHKIN (admitted pro hac 1 vice) 2 bmishkin@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 3 200 Park Avenue 4 New York, NY 10166-0193 5 Telephone: 212.351.4000 Facsimile: 212.351.4035 6 7 ATTESTATION OF CONCURRENCE IN FILING 8 9 Pursuant to Local Rule 5-4.3.4 of the United States District Court for the Central District of California, I attest that Counsel for Plaintiffs, Counsel for 10 Defendants Silver Wheaton, Smallwood, Barnes, and Brown, and Counsel for 11 Deloitte LLP (Canada) have authorized the filing of this document. 12 /s/ Laurence M. Rosen 13 Laurence M. Rosen 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 - 4 -

CERTIFICATE OF SERVICE 1 2 I, Laurence Rosen, hereby declare under penalty of perjury as follows: I am attorney with the Rosen Law Firm, P.A., with offices at 355 South Grand 3 Avenue, Suite 2450, Los Angeles, CA, 90071. I am over the age of eighteen. 4 On April 24, 2018, I electronically filed the foregoing STIPULATION 5 SETTING SCHEDULE FOR (1) BRIEFING ON MOTION TO DISMISS AND (2) ACCEPTING SERVICE OF THE SUMMONS AND COMPLAINT with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to counsel of record. Executed on April 24, 2018 10 11 /s/ Laurence Rosen 12 Laurence Rosen 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 - 5 -